

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION**

HUDSON SPECIALITY INSURANCE COMPANY

PLAINTIFF

V.

CASE NO. 5:17cv137-DCB-MTP

**TALEX ENTERPRISES, LLC; JUBILEE PERFORMING
ARTS CENTER, INC.; TERRANCE L. ALEXANDER; the
BOARD OF MAYOR AND SELECTMEN
OF MCCOMB, MISSISSIPPI, et al.**

DEFENDANTS

RESPONSE TO ORDER

Mark J. Goldberg of the firm of Cosmich Simmons & Brown, PLLC, hereby responds to the Court's Order [Doc. 273] and supplements his Unopposed Motion to Withdraw as Counsel ("Motion to Withdraw") [Doc. 272] as follows:

1. The undersigned has informed Defendant/Counter-Claimant the Board of Mayor and Selectmen of McComb, Mississippi ("McComb") of the Motion to Withdraw through the Honorable Quordiniah Lockley, Mayor of McComb. McComb does not oppose the subject motion.

2. The undersigned has informed Defendants/Counter-Claimants Talex Enterprises, LLC ("Talex"); Terrance L. Alexander; and, Jubilee Performing Arts Center, Inc. ("Jubilee") of the Motion to Withdraw through Terrance L. Alexander. Talex, Terrance L. Alexander, and Jubilee do not oppose the subject motion.

3. The undersigned has conferred with Wayne Dowdy of Dowdy & Cockerham regarding the Motion to Withdraw. Mr. Dowdy has advised that he and Defendants/Counter-Claimants are prepared to move forward and meet all current deadlines and settings if the withdrawal is permitted.

WHEREFORE, PREMISES CONSIDERED, Mark J. Goldberg respectfully requests that this Court enter an Order allowing him to withdraw as counsel of record in the current litigation.

This, the 1st day of June, 2020.

Respectfully submitted,

TALEX ENTERPRISES, LLC; JUBILEE
PERFORMING ARTS CENTER, INC.;
TERRANCE L. ALEXANDER; AND THE
BOARD OF MAYOR AND SELECTMEN OF
MCCOMB, MISSISSIPPI

BY: COSMICH SIMMONS & BROWN, PLLC

/s/ Mark J. Goldberg
MARK J. GOLDBERG

WAYNE DOWDY, MSB # 6177
DOWDY & COCKERHAM
215 East Bay Street
Post Office Box 30
Magnolia, MS 39652
(601) 783-6600 Telephone
(601) 783-3670 Facsimile
waynedowdy@waynedowdy.com

Of Counsel:

MARK J. GOLDBERG, MSB # 101874
COSMICH SIMMONS & BROWN, PLLC
One Eastover Center
100 Vision Drive, Suite 200
Post Office Box 22626 (39225-2626)
Jackson, Mississippi 39211
Telephone: (601) 863-2100
Facsimile: (601) 863-0078
markgoldberg@cs-law.com

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2020, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all ECF participants, and I hereby certify that I have caused to be mailed by United States Postal Service the document to the following non-ECF participants:

Michelle Nelson
1038 Airport Fernwood Road
McComb, MS 39648

Cox Architecture, P.A.
Steven Cox
110 North Broadway Street
McComb, MS 39648

/s/ Mark J. Goldberg
MARK J. GOLDBERG